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February 13, 2025

VIA ECF

Honorable Vernon S. Broderick
United States District Court
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square, Room 415
New York, NY 10007

Re: Hogans v. N.Y.C. Comptroller's Office et al, No.: 1:23-cv-10514-VSB-OTW

Dear Judge Broderick:

Our firm represents Defendant District Council 37, American Federation of State, County, and Municipal Employees (“DC 37”). We write in connection with Plaintiff’s letter application—filed on January 13, 2025 with the Court’s *pro se* office and docketed by the Court on February 10, 2025—seeking an extension of time to respond to Defendants’ motions to dismiss, including DC 37’s motion to dismiss.

DC 37 filed its motion to dismiss on November 18, 2024. Plaintiff’s opposition was originally due on December 2, 2024. Recognizing that Plaintiff was proceeding *pro se*, on November 20, 2024, my colleague Alexander Langer contacted Plaintiff to see if she required a reasonable extension of time. Plaintiff requested a 75 to 90-day extension. On November 25, 2024, I reached out via email to advise that DC 37 would agree to an extension of some length, but that I was awaiting approval from my client on whether they would consent to a 75-day extension from the original due date of December 2, 2024.

On December 2, 2024, I received a follow-up email from Plaintiff regarding the requested extension. I responded the next day indicating that DC 37 would agree to the 75-day extension from December 2, 2024. Plaintiff did not file a request with the court regarding the extension until January 13, 2025, where she indicated our consent without providing when the request was made and the consent given.

While we understand that Plaintiff is representing herself and acknowledge our agreement to a 75-day extension of the original due date, we wanted to clarify that the Union Defendants did not consent to an additional 75-day extension. We ask the Court to set a reasonable deadline under the circumstances so that the case may move forward.

We thank the Court for its consideration of this request.

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Respectfully submitted,

/s/ Dina Kolker

Dina Kolker
Counsel for DC 37

cc: Keisha D. Hogans (via mail)
All Counsel of Record (via ECF)